

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF DEBORAH STEIN IN  
SUPPORT OF FACEBOOK, INC.'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL THE SPECIAL MASTER'S  
AMENDED ORDER REGARDING  
PRODUCTION OF NAMED PLAINTIFF  
DATA**

I, Deborah Stein, hereby declare as follows:

1. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bars of California and New York. I submit this declaration in support of Facebook’s Administrative Motion to File Under Seal the Special Master’s Amended Order Regarding Production of Named Plaintiff Data. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. Attached as **Exhibit A** is a true and correct<sup>1</sup> **redacted** copy of Special Master Garrie’s July 1, 2022 Amended Order Regarding Production of Named Plaintiff Data and its supporting exhibits (the “Order”).

3. Attached as **Exhibit B** is a true and correct **unredacted** copy of the Order.

4. Facebook proposes redacting confidential information regarding the names of certain Facebook data systems, where specific data is stored within Facebook’s data systems, and Facebook’s proprietary data storage and processing practices.<sup>2</sup> This information includes the

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<sup>1</sup> The Special Master appears to have inadvertently included a few personal annotations in the exhibits attached to the Order. We removed his personal annotations from Exhibits A and B.

<sup>2</sup> Order at ¶¶ 18–21, 18 n. 2, 24, 26, 32; Order Ex. I at Tr. at 8:13–25, 9:1–8, 24–25, 10:1–2, 7–8, 10, 13–14, 21, 24–25, 11:1, 11, 11:13–15, 20–25, 12:8, 13:19–23, 25, 14:1–4, 8, 18, 22, 25, 15:12–20, 22–25, 16:2, 7, 10, 17:8, 18:8, 19, 22–23, 19:5–6, 12–13, 16–21, 23–25, 20:1, 3–9, 13–21, 21:2, 8–10, 15–16, 25, 22:2, 7, 13–15, 17–22, 23:5–9, 13, 15, 21–24, 24:12–14, 17–18, 20–21, 24, 25:8, 11, 17, 22, 26:6, 11–15, 17–20, 22–25, 27:1–3, 6, 9, 17, 29:2–5, 10–11, 14–15, 21–23, 25, 30:4, 7–8, 11, 14–17, 19–20, 25, 31:2, 11–13, 32:5–7, 12, 17–18, 21–24, 33:17, 19, 21–23, 25, 34:1, 4, 9, 12–13, 16, 18–21, 23, 35:10–11, 36:3, 7, 18, 37:10–14, 20–21, 23–24, 38:2, 9–10, 24–25, 39:1–3, 9, 21, 24, 40:5–8, 10, 41:2, 6, 18, 42:4, 10–11, 14–15, 43:1–4, 24, 44:2–4, 15, 45:2–3, 7, 13–14, 17–20, 46:14, 16, 47:13, 21, 48:12, 24, 49:3, 9–11, 18, 20–21, 51:8, 16, 52:9–14, 54:5, 14–15, 20–24, 55:1, 4–5, 24, 56:15, 57:3, 10–11, 18, 58:15, 59:8, 21–22, 60:12–15, 22, 61:1, 11, 15, 21, 24, 62:10, 14, 24, 63:6–7, 9, 18, 64:5, 7, 12, 14, 18, 25, 65:6, 25, 66:4–5, 25, 67:4–7, 16–22, 24, 68:2, 16, 20–21, 69:3, 12, 23, 70:2, 4–5, 8, 12–13, 71:24, 72:5, 10, 73:5, 25, 74:23, 75:15, 76:2–7, 10, 12, 15, 18, 77:3, 78:16–20, 23–25, 80:9, 81:25, 82:1–2, 5–6, 84:25, 85:11, 19, 86:11, 87:2, 7, 12, 20, 88:10, 20, 23, 25, 90:8, 91:20, 92:5–7, 9, 21, 93:4, 14, 16, 19, 94:7, 10, 13–14,

functions and architecture of specific data systems, details about how specific data flows through Facebook's data systems, and Facebook's confidential and proprietary methods of protecting and anonymizing user data across its data systems. How Facebook stores, manages, tracks, preserves, deletes, and processes data for billions of users across its data systems are key components of its business that set it apart and ahead of its competitors. I understand that, if publicly disclosed, Facebook's competitors could take advantage of this information to improve their own methods

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95:6, 11, 14, 18, 96:6, 8, 19, 22, 97:8, 13, 21–22, 98:3, 6, 10, 14, 20–21, 23–24, 99:1, 4, 17, 20, 25, 100:3, 13, 101:5, 13, 19, 23, 102:1, 8, 10–12, 103:3, 5, 10, 12–14, 104:17–19, 105:23–24, 106:11–13, 15, 19, 23, 25, 107:1, 8–9, 13, 20, 108:3, 13, 15, 19, 22, 25, 109:5–8, 13, 19, 110:3, 12, 15, 22, 24, 111:3, 6, 8, 15, 17, 19, 112:2, 4–6, 9, 12, 113:2, 13, 15, 18, 21, 114:11, 18, 21, 25, 115:3, 11, 116:10, 18–20, 119:3–5, 18–19, 21–22, 121:16–17, 126:3–4, 6–10, 12, 16, 127:1, 4, 6–8, 11–13, 16–20, 22, 24–25, 128:7, 11–12, 131:16–17, 21–22, 132:2–3, 133:13; Order Ex. J at Defendant Facebook, Inc.'s Submission in Compliance with the Special Master's Amended Order re Plaintiffs' Motion to Compel Production of Plaintiff Data; Order Ex. K at 2–7; Order Ex. L at Tr. at 28:17–23, 29:16–23, 30:3, 16, 22, 31:6–7, 42:21–23, 43:1, 5, 7–8, 13, 21, 44:1, 6–7, 13–16, 19, 45:1, 3, 19, 21, 47:6–7, 54:5–6, 12, 66:18, 22, 67:1, 7, 10, 12, 14–15, 17–19, 68:9, 11–13, 16, 19–21, 70:21–71:2, 83:9–10, 84:17, 85:22, 24, 91:8–9, 14–15, 92:16, 18, 93:2–4, 94:8–9, 14, 19–23, 96:3, 5–6, 8, 19, 21, 25, 97:4, 98:1, 3, 10–13, 99:8, 100:5, 11, 14, 17–18, 105:9–22, 106:2, 110:22, 111:20, 112:1, 4–5, 18, 116:18–20, 121:19–22, 124:17, 130:2–3, 25, 131:10–11, 13–15, 132:12, 133:10–12, 14–16, 135:16–21, 140:9, 146:23–147:9, 151:5, 11–12, 15, 153:22, 25, 154:1, 4, 10, 13–14, 20, 23–24, 155:2–3, 9, 18, 21, 24, 156:7, 14, 157:5–6, 10, 13, 16, 19, 25, 158:1–2, 5, 15–16, 19–21, 25, 159:1–2, 160:8, 11, 20, 161:14, 23–24, 162:7–8, 10, 22, 25, 163:4, 8, 14, 24, 164:3, 5–6, 14, 18, 23, 166:13–15, 19, 167:5, 21–24, 168:1, 7, 23–24, 169:3, 6; Order Ex. N at Tr. at 16:7–8, 15–16, 22, 17:8, 11, 14–16, 18–19, 18:7, 9–11, 22–24, 19:16, 20:6, 21:9–14, 23–25, 27:6–7, 10, 13, 15–16, 19–22, 24–25, 28:2–4, 9–17, 20–22, 29:1–4, 21, 30:1–7, 18–25, 31:1, 8–10, 14, 24, 33:4, 13–14, 23–25, 34:4–5, 35:1, 36:8–12, 14–15, 18, 21, 24–25, 37:6–7, 10–14, 16–20, 22–23, 25, 38:4, 11, 19, 25, 39:3, 8, 44:10–14, 50:15–21, 51:9, 12–16, 19, 23–25, 52:1, 9–12, 24–25, 53:9–10, 54:5, 11–14, 55:11–14, 56:1–3, 17–24, 57:1–2, 4–5, 7–11, 15–16, 67:22–25, 68:1–3, 69:18–21, 72:24–25, 73:4, 21–23, 74:3–6, 75:4–8, 13, 18–25, 76:2–7, 14–16, 18, 21, 23–25, 81:1–2, 23–25, 82:14, 85:1–2, 86:13–14, 88:13–25, 89:1–2, 90:20–25, 91:1–4, 92:2, 5–6, 13, 18–24, 93:1–4, 102:17–18, 103:2, 4, 12, 105:16, 21–22, 106:3–6, 8, 17, 25, 107:15, 108:7, 23–25, 109:2, 11–15, 18–20, 25, 110:2, 6, 10, 15, 111:10, 14–19, 112:2, 5, 7, 20–25, 113:1–4, 16, 114:17, 24, 115:7, , 118:2–9, 11–16, 119:8–11, 14–17, 19–21, 25, 120:1–7, 17–21, 23–24, 121:3–4, 6, 8–11, 124:22, 127:1–2, 10–11, 13–17, 19–21, 23–25, 130:10, 19, 21, 135:3–6, 140:23–24, 142:1, 15, 143:20–25, 145:3–4, 6–8, 12–13; Order Ex. Q at 6–7; Order Ex. S at 4; Order Ex. T at 1–3, Internal Ex. A at 1–6; Order Ex. U at 1–3; Order Ex. V at 2–7, Internal Ex. A at 1–3, 5–7; Order Ex. W at 1, 3; Order Ex. X at 1–3.

for managing high volumes of user data or for tracking and anonymizing user data across data systems, to Facebook's competitive disadvantage. Hackers and other bad actors also could use this information to better understand Facebook's data systems and target specific repositories of data, potentially harming both Facebook and its users.

5. Facebook proposes redacting confidential information regarding its tool for responding to law-enforcement requests for user records, including the name of the tool, the types of data it contains, the delta between the data within the tool and DYI, and the format in which data from the tool is produced.<sup>3</sup> I understand that public disclosure of details about this tool would reveal confidential information regarding Facebook's internal operations that could be used by bad actors to attempt to circumvent and evade Facebook's enforcement strategies and current and future lawful governmental criminal investigations. I further understand that public disclosure of Facebook's internal processes related to the tool could provide confidential information to competitors about how Facebook tracks and stores data across its systems, to Facebook's competitive disadvantage.

6. Facebook proposes redacting confidential information regarding Facebook's privacy and platform policy enforcement practices, including how Facebook identifies apps and developers that may be violating its policies.<sup>4</sup> I understand that public disclosure of details regarding Facebook's policy-enforcement efforts would reveal confidential information regarding Facebook's internal operations that could be used by bad actors to attempt to circumvent and evade Facebook's enforcement strategies, potentially harming Facebook and its users.

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<sup>3</sup> Order at ¶¶ 19–23, 28, 30; Order Ex. V at 2–5, 7, Internal Ex. A at 1–6; Order Ex. W at 1–2; Order Ex. X at 1–2.

<sup>4</sup> Order Ex. L at Tr. at 128:10–11, 13–16; 158:11–12; Order Ex. N. at Tr. at 26:3–7, 58:11–14, 16–18, 59:1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 5, 2022 in Los Angeles, California.

*/s/ Deborah Stein*  
Deborah Stein